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1 2	JONATHAN R. BASS (State Bar No. 75779) A. MARISA CHUN (State Bar No. 160351) COURTNEY SHAW HUIZAR (State Bar No. 230324)		
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8	PRITZI BENESCII		
9	UNITED STATES DISTRICT COURT		
10	NORTHERN DISTRICT OF CALIFORNIA		
11			
12	FRITZI BENESCH,	Case No	o. C 07-3784 I
13	Plaintiff,		ARATION O
14	v.	CONTI	PORT OF S'
15	SHARON GREEN; and DOES 1 through 10, inclusive,		GEMENT C TED DATES
16	Defendants.	Date:	October 30,
17		Time:	10:00 a.m.
18	SHARON GREEN,	Ctrm: Judge:	Courtroom I Hon. Elizab
19	Cross-Complainant,		
20	v.		
21	FRITZI BENESCH, and ROES 1 through 25, inclusive,		
22	,		
23	Cross-Defendants.		
24			
25			

Case No. C 07-3784 EDL

DECLARATION OF JONATHAN R. BASS IN SUPPORT OF STIPULATION FOR CONTINUANCE OF INITIAL CASE MANAGEMENT CONFERENCE AND RELATED DATES

October 30, 2007 Date:

Ctrm: Courtroom E, 15th Floor Judge: Hon. Elizabeth D. Laporte

12670.003.722834v1 Case No. C 07-3784 EDL 1

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I, Jonathan R. Bass, declare:

- 1. I am an attorney admitted to practice in the State of California and before this Court, and am a member of the firm of Coblentz, Patch, Duffy & Bass LLP, counsel of record for Fritzi Benesch, the plaintiff and cross-defendant in this action. I make the following declaration based on my own personal knowledge.
- 2. I am unavailable to participate in the currently-scheduled October 30, 2007 case management conference due to a pre-existing scheduling conflict.
- 3. The parties' request to continue the initial case management conference from October 30 to November 13, 2007 is the first request for a continuance that has been made in this case. There have been no previous time modifications, whether by stipulation or Court order.
- 4. Given that there are no other upcoming deadlines, this short continuance ought not to have any significant impact on the case's progress. Further, the parties are discussing whether a stay of this action, including a stay of all discovery matters, may be warranted. Accordingly, the continuance of the initial disclosure and Rule 26(f) report deadlines to December 7, 2007 will help to conserve judicial and the parties' resources, as the need for filing such pleadings may be obviated by the parties' and the Court's decision regarding a stay of this action.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: October 19, 2007

JONATHAN R. BASS

12670.003.722834v1